

November 23, 2005

Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, DC 20554

To Whom It May Concern:

Re: Compliance Letter on VoIP (due date: November 28, 2005)  
WC Docket No. 05-196

As stated in the "Public Notice" issued by the Federal Communications Commission dated November 7, 2005, to ensure that Panhandle Telecommunication Systems, Inc., (PTSI) has satisfied the VoIP 911 requirements, following is the information confirming PTSI's compliance:

- ***911 Solution:*** *The description should include a quantification, on a percentage basis, of the number of subscribers to whom the provider is able to provide 911 service in compliance with the rules established in the VoIP 911 Order. Further, the detailed description of the technical solution should include the following components.*

Response: PTSI is in fact able to provide 911 service in compliance with the rules established in the VoIP 911 Order to one hundred percent (100%) of its subscribers.

- ***911 Routing Information/Connectivity to Wireline E911 Network:*** *A detailed statement as to whether the provider is transmitting, as specified in Paragraph 42 of the VoIP 911 Order, "all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority, utilizing the Selective Router, the trunk line(s) between the Selective Route and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized." If the provider is not transmitting all 911 calls to the correct answering point in areas where Selective Routers are utilized, this statement should include a detailed explanation why not. In addition, the provider should quantify the*

*number of Selective Routers to which it has interconnected, directly or indirectly, as of November 28, 2005.*

Response: There is no selective router utilized. All calls are routed to the appropriate PSAP via the ILEC switch in the same manner as all traditional landline calls. Our PTSI service is non-nomadic. Our customers can not relocate their service. Therefore, all ANI and location database information accurately reflects the caller location.

- ***Transmission of ANI and Registered Location Information:** A detailed statement as to whether the provider is transmitting via the Wireline E911 Network the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information. This information should include: (i) a quantification, on a percentage basis, of how many answering points within the provider's service area are capable of receiving and processing ANI and Registered Location information that the provider transmits; (ii) a quantification of the number of subscribers, on a percentage basis, whose ANI and Registered Location are being transmitted to answering points that are capable of receiving and processing this information; and (iii) if the provider is not transmitting the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information, a detailed explanation why not.*

Response: There is only one PSAP in our service area which services one of our three counties. This PSAP is capable of processing traditional E911 calls. Since PTSI's service is not nomadic in nature, calls are routed and transmitted the same as traditional landline customers. In locations where E911 is not available (there is no PSAP), calls are routed to the designated answering point, just as we do our traditional landline calls.

- ***911 Coverage:** To the extent a provider has not achieve full 911 compliance with the requirements of the VoIP 911 Order in all areas of the country by November 28, 2005, the provider should: 1) describe in detail, either in narrative form or by map, the areas of the country, on a MSA basis, where it is in full compliance and those in which it is not; and 2) describe in detail its plans for coming into full compliance with the requirements of the order, including its anticipated timeframe for such compliance.*

Response: PTSI only operates non-nomadic service, thereby making PTSI 100% compliant.

- ***Obtaining Initial Registered Location Information:*** A detailed description of all actions the provider has taken to obtain each existing subscriber's current Registered Location and each new subscriber's initial Registered Location. This information should include, but is not limited to, relevant dates and methods of contact with subscribers and quantification, on a percentage basis, of the number of subscribers from whom the provider has obtained the Registered Location.

Response: With PTSI's non-nomadic service, subscribers can not move from their initial installed location; therefore, there is no requirement to provide updated registration information. Even though our service is non-nomadic, we have complied 100% with the FCC requirements of all subscriber notifications.

- ***Obtaining Updated Registered Location Information:*** A detailed description of the method(s) the provider has offered its subscribers to update their Registered Locations. This information should include a statement as to whether the provider is offering its subscribers at least one option for updating their Registered Location that permits them to use the same equipment that they use to access their interconnected VoIP service.

Response: Please see response immediately above, as this is not applicable.

- ***Technical Solution for Nomadic Subscribers:*** A detailed description of any technical solutions the provider is implementing or has implemented to ensure that subscribers have access to 911 service whenever they use their service nomadically.

Response: Again, this is not applicable, as our service can not be used in a nomadic fashion.

PTSI did not begin offering VoIP service until July 1, 2005; therefore, this is our first VoIP filing to the FCC. Another filing was required approximately six (6) months ago, but we were not required to file since our company was not offering VoIP service at that time.

If you have any questions, or have problems with this electronic filing, please contact me at (580) 468-2130, or by email at [gaylynn.bohanan@ptci.net](mailto:gaylynn.bohanan@ptci.net).

Respectfully,

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